

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

GREAT NORTHERN INSURANCE CO.
As subrogee of Juan A. Rodriguez Vila and
Iwalani Rodriguez

CIVIL NO. 11-1303 (DRD)

Plaintiff

Vs.

EL LEGADO PROPERTY MANAGEMENT
COMPANY, INC.; EL LEGADO DE CHI CHI
RODRIGUEZ GOLF RESORT, INC.;
EL LEGADO DE CHI CHI RODRIGUEZ
GOLF RESORT, (SC) SE; EL LEGADO
HOMEOWNER'S ASSOCIATION, INC, and
EL LEGADO CONDOMINIUM, REGIME I

Re: NEGLIGENCE, BREACH OF
CONTRACT, & BREACH
OF WARRANTY

Codefendants

MOTION TO SET ASIDE INITIAL SCHEDULING CONFERENCE

TO THE HONORABLE COURT:

COMES NOW REAL LEGACY ASSURANCE COMPANY, INC, through the undersigned counsel and without submitting to this Honorable Court`s jurisdiction, respectfully sets forth and prays:

1. This Honorable Court set the Initial Scheduling Conference in the instant case for 2/08/2012. (See Docket No. 35).
2. Plaintiff amended the complaint filed in the instant case on 1/19/2012 to bring Real Legacy Assurance Company, Inc. as defendant. (See Docket No. 42). Plaintiff is in the process of serving process upon Real Legacy Assurance Company, Inc.
3. After being served with process, Real Legacy will need at least 20 days to do its investigation about the facts alleged in the amended complaint, to be in an informed position

2.

to answer the amended complaint or otherwise plead.

WHEREFORE, it is respectfully requested from this Honorable Court, to set aside the Initial Scheduling Conference scheduled for 2/08/2012 at Docket No. 35.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 20th day of January, 2012.

S/ ERNESTO R. IRIZARRY

ERNESTO R. IRIZARRY

USDC-PR No. 126702

Attorney for

REAL LEGACY ASSURANCE COMPANY, INC.

ERNESTO R. IRIZARRY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date a true and exact copy of the foregoing has been filed electronically with the Clerk of the Court via CM/ECF system which will send notification of such filing via e-mail to all the attorneys of record.

S/ ERNESTO R. IRIZARRY

ERNESTO R. IRIZARRY

